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7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

9 UNITED STATES OF AMERICA,
10

11 Plaintiff,

12 vs.

13 EMERALD RUTH WILSON-BEY,
14

15 Defendant.
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CASE NO: 2:21-cr-00306-GMN-NJK

STIPULATION AND ORDER TO
ADVANCE CHANGE OF PLEA
HEARING

18 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson
19 United States Attorney, through Jim. W. Fang, Assistant United States Attorney, counsel for the
20 United States of America, and Jennifer M. Waldo counsel for Emerald Ruth Wilson-Bey that the
21 Change of Plea hearing, currently scheduled for Tuesday, December 6 be vacated and advanced
22 to Tuesday, November 29, 2022 at 9:00 a.m.
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The Stipulation is entered into for the following reasons:

1. That the parties resolved this matter through pretrial plea negotiations and have submitted a fully-executed plea agreement to the Court for its consideration;
2. On November 2, 2022, an expedited change of plea hearing was set for December 6, 2022 at 11:00 a.m.;
3. That after the above date was set, counsel for Ms. Wilson-Bey was scheduled for surgery on December 6, 2022;
4. That Ms. Wilson-Bey has requested an expedited change of plea hearing and her counsel does not want to delay said hearing until she recovers from surgery, which would be approximately four to six weeks; and
5. That counsel for Ms. Wilson-Bey has spoken to government counsel and the government has no objection to advancing the change of plea hearing.

DATED this 17th day of November, 2022.

JASON M. FRIERSON
United States Attorney

Waldo Law, LLC.

By: /s/ Jim. W. Fang
Counsel for USA

By: /s/ Jennifer M. Waldo
Counsel for Emerald Ruth Wilson-Bey

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10 *Attorney for Emerald Wilson-Bey*

11 UNITED STATES DISTRICT COURT
12 DISTRICT OF NEVADA

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 vs.

16 EMERALD RUTH WILSON-BEY,

17 Defendant.

CASE NO: 2:21-cr-00306-GMN-NJK

**STIPULATION AND ORDER TO
ADVANCE CHANGE OF PLEA
HEARING**

18 **FINDINGS OF FACT**

- 19
- 20 1. That the parties resolved this matter through pretrial plea negotiations and have
21 submitted a fully-executed plea agreement to the Court for its consideration;
 - 22 2. On November 2, 2022, an expedited change of plea hearing was set for December
23 6, 2022 at 11:00 a.m.;
 - 24 3. That after the above date was set, counsel for Ms. Wilson-Bey was scheduled for
25 surgery on December 6, 2022;
 - 26 4. That Ms. Wilson-Bey has requested an expedited change of plea hearing and her
counsel does not want to delay said hearing until she recovers from surgery, which
would be approximately four to six weeks; and

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5. That counsel for Ms. Wilson-Bey has spoken to government counsel and the government has no objection to advancing the change of plea hearing.

CONCLUSIONS OF LAW

The ends of justice served by granting said continuance outweigh the best interests of the public and the defense in a proceeding with the sentencing hearing as currently scheduled.

ORDER

IT IS THEREFORE ORDERED that the change of plea hearing currently scheduled for December 6 at 11:00 a.m., be vacated and continued to the 29th day of November, 2022, at the hour of 9:00 a.m.

DATED AND DONE this 18 day of November, 2022.


UNITED STATES DISTRICT JUDGE